

October 28, 1993

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The Secretary  
FCC  
1919 M Street NW  
Washington, DC 20554

RM-7594

I am submitting the original and two copies of our  
COMMENTS in the matter of ~~RM-75-95~~, Notice of Inquiry  
into operation of AM directional antennae.

Thank you.

Very truly yours,

*Al Germond*  
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BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

In the Matter of:  
Notice of Inquiry-  
AM Directional Operation

93-177 /  
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RM: 75-94

Now comes Al Germond of Columbia, Missouri, who offers the following comments and observations in the matter of AM directional stations:

Historically, AM directional operation has served the public interest in allowing vastly increased station operation, both day and night in the crowded standard broadcast spectrum. However, the Commission needs to revisit this situation now that the AM spectrum has become so chaotic especially at night.

Specifically, permission to operate traditional "daytime" stations, meaning local sunset to sunrise hours with reduced powers, usually non-directionally, has served to trash the AM spectrum, particularly on the old Class III (now Class B) channels.

Historically, those channels -- such as 930 kHz -- contained a limited number of Class III-A facilities which under allocation schemes dating to the 1930s protected each other with patterns at night. Thus, WPAT, Paterson, N.J. protected WBEN, Buffalo, N.Y. and WKY, Oklahoma City among others while the night WBEN pattern was devised to protect WKY and WJAX, Jacksonville, Florida. When other stations were subsequently licensed to operate at night, their patterns were devised to protect the original, older occupants of each

channel. Unfortunately, engineering zeal and political considerations let the original, structured allocation scheme get out of hand.

More recently, the decision to allow virtually every daytime station licensed on 930 kHz (to continue this example) with reduced-power, non-directional night operation has mooted the original, well-defined night directional protection scheme. If the Commission plans to continue limited-power night operation by former "daytimers," the Commission should relax its strict directional operating parameters for stations operating fulltime under the original well-defined night directional scheme.

Returning to the earlier 930 kHz example, WPAT, Paterson, N.J., must now protect WBEN, Buffalo, N.Y. However, the addition of numerous formerly "daytime" stations to 930 kHz with limited night power severely increases the skywave noise level to outer areas of WPAT's local, formerly protected night contour. The former order of the Commission's protected allotment scheme on this channel has been destroyed by increased skywave noise and the need for directionalization rendered moot.

Many of the former "daytimers" now allowed to operate at night on 930 kHz allegedly rendering night service to their communities are at the same time battling mutually-destructive interference and night skywave noise. They would be better off closing down at sunset.

I believe the Commission should allow stations now required to provide strict protection to other co-channel occupants to relax required protections. Those stations would be allowed to operate non-directionally with full daytime power or if interference was still considered egregious in certain situations, operate non-directional with

reduced power. The Commission should revisit the situation and experiment with actual situations. For example, it could grant limited, test authority to determine the effect of night, non-directional operation by stations now required to strictly protect other stations.

I urge the Commission to revisit the whole question of AM operation with an actual, contemporary analysis of in-band operating conditions. I believe the decision to slightly depopulate the existing band (535-1605 kHz) and create an additional ten channels is a miniscule, erroneous step to reduce interference. Political considerations aside, the Commission should consider stronger measures.

As in 1927-8 when the Federal Radio Commission assumed jurisdiction over broadcasting, the Commission could initiate re-application and licensing of all AM radio stations in the **United States**. That is, each existing licensee would be required to re-apply and justify existence in the AM spectrum. This would weed-out marginal operations and restore some order to the messy allotment scheme which has developed.

The Commission could revisit its multiple ownership rules and allow replacement of AM facilities with comparable frequency modulation (FM) facilities. That is, the AM operator will forfeit the AM facility but be allowed to replace it with an FM facility of comparable coverage where possible. The AM facility would be decommissioned; the channel would never again be occupied by a **station** in that community or area. This would depopulate the AM spectrum and reduce interference.

Respectfully submitted,

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